

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

K.MIZRA LLC,

Plaintiff,

v.

CISCO SYSTEMS, INC.,

Defendant.

Civil Action No. 6:20-cv-01031-ADA

Jury Trial Demanded

**JOINT NOTICE OF SECOND PROPOSED AMENDMENT OF SCHEDULING ORDER**

Plaintiff K.Mizra LLC and Defendant Cisco Systems, Inc. (collectively, "the Parties") respectfully submit this notice of their second proposed amendment of certain dates set forth in the Court's Scheduling Order (ECF No. 76) and set forth in the Parties' Joint Notice of Proposed Amendment of Scheduling Order filed February 9, 2023 (ECF No. 83). Specifically, the Parties have agreed upon a one-week extension of time for the Parties to complete expert reports. The Parties also have agreed upon a one-week extension of time for expert discovery, the filing of any dispositive motions and *Daubert* motions, including responses and replies thereto, pretrial disclosures, and motions *in limine*, including responses and replies thereto, following the close of expert discovery.

The Parties note that the current dates for the joint pretrial order and pretrial submissions, the final pretrial conference, and trial (*see* ECF Nos. 76 and 83) will not be affected by the Parties' proposed amended schedule. For the Court's convenience, a comparison of the current dates and the Parties' proposed dates are set forth in the following chart:

Event	Current Deadline	Parties' Proposed Date
Opening Expert Reports.	April 14, 2023	April 21, 2023
Rebuttal Expert Reports.	May 5, 2023	May 12, 2023
Close of Expert Discovery.	May 26, 2023	June 2, 2023
Deadline to meet and confer to discuss narrowing the number of claims asserted and prior art references to triable limits.	May 26, 2023	June 2, 2023
Dispositive motion deadline and <i>Daubert</i> motion deadline.	June 2, 2023	June 9, 2023
Deadline to file Response to <i>Daubert</i> motions.	June 16, 2023	June 23, 2023
Deadline to file Response to Dispositive Motions.	June 16, 2023	June 23, 2023
Deadline to file Replies to Responses to Dispositive motions	June 23, 2023	June 30, 2023
Deadline to file Replies to Responses to <i>Daubert</i> motions.	June 23, 2023	June 30, 2023
Serve Pretrial Disclosures (jury instructions, exhibit lists, witness lists, discovery, and deposition designations).	June 9, 2023	June 16, 2023
Serve objections to pretrial disclosures/rebuttal disclosures.	June 23, 2023	June 30, 2023
Serve objections to rebuttal disclosures and file motions <i>in limine</i> .	June 30, 2023	July 14, 2023
File Joint Pretrial Order and Pretrial Submissions (jury instructions, exhibit lists, witness lists, discovery and deposition designations).	July 14, 2023	No Change
File oppositions to motions <i>in limine</i> .	July 14, 2023	July 21, 2023
File reply briefs to motions <i>in limine</i> .	July 21, 2023	July 28, 2023
Deadline to meet and confer regarding remaining objections and disputes on motions <i>in limine</i> .	July 21, 2023	July 25, 2023
File Joint Notice identifying remaining objections to pretrial disclosures and disputes on motions <i>in limine</i> .	July 28, 2023	No Change

Event	Current Deadline	Parties' Proposed Date
Final Pretrial Conference.	August 1, 2023	No Change
Jury Selection/Trial.	August 14, 2023	No Change

Accordingly, the Parties respectfully request that the Court enter the Amended Scheduling Order as set forth in the above chart.

Dated: April 7, 2023

By: /s/ Paul S. Cha

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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document has been served on April 7, 2023, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

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